UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of (LTS)

PROMESA TITLE III Case No. 17-BK-3283

THE COMMONWEALTH OF PUERTO RICO, et al., Debtors¹

MOTION REQUESTING EXTENSION OF TIME TO FILE CERTIFIED TRANSLATION OF THE JUDGEMENTS ENTERED BY THE COURT OF FIRST INSTANCE OF PUERTO RICO IN THE CASES NO. KAC-1990-0487 AND K AC 2005-5021 AND RELATED DOCUMENTS

To the Honorable United States District Court Judge Laura Taylor Swain:

COME NOW, NOW COME, the group creditors in the litigation captioned: *Juan Perez Colon et al. v. Puerto Rico Department of Transportation & Public Works*, Case No. KAC1990-0487 (the "Perez Colon Master Claim no. 30851") and the group creditors in the litigation captioned: *Jeanette Abrams Diaz et al. v. a Department of Transportation & Public Works*, Case No. KAC-2005-5021 (the "Abrams Diaz Master Claim No.50221") by and through the undersigned attorney, respectfully state, allege and pray:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. The appearing claimants filed a Motion for Allowance and Payment of

an Administrative Expense Priority today, at docket 18239. The Motion references

and cites portions of the Judgments entered by the Court of Instance of Puerto Rico

in the cases of Juan Perez Colon et als. K AC 1990-0487 and Abrams Diaz et als K

AC 2005-5021, and two December 11, 2015 Certifications.

2. The Judgments and identified documents must be translated into the

English language for the Court's review and in compliance with PR- Local District

Court Rule no. 5.

3. Therefore, Movant's pray for a thirty day extension until October 25,

2021 to file the certified translation of identified documents.

WHEREFORE, the appearing claimants respectfully pray for this Honorable

Court to grant this request for a thirty day extension until October 25, 2021 to file

the Certified translation of the referenced Judgments and documents.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24 day of September, 2021.

IT IS HEREBY CERTIFIED, that on this same date we have electronically filed the

foregoing motion with the Clerk of the Court using the CM/ECF System, which will send

notification of such filing to all counsels of record.

By: /s/ IVONNE GONZALEZ-MORALES

IVONNE GONZALEZ-MORALES

USDC NUM: 202701 PO BOX 9021828

SAN JUAN, PR 00902-1828

Tel. (787) 410-0119

E-mail: ivonnegm@prw.net

Attorney for the Group Creditors